

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

JERRY LEON DEES, JR.,

Plaintiff,

v.

**HYUNDAI MOTOR MANUFACTURING
ALABAMA, LLC, and HYUNDAI
MOTOR AMERICA, INC.,**

Defendants.

**CIVIL ACTION NO.:
2:07-cv-00306-MHT-CSC**

DEFENDANTS' WITNESS LIST

Pursuant to Fed. R. Civ. P. Rule 26(a)(3) and the Court's Uniform Scheduling Order (Doc. 19), Defendants Hyundai Motor Manufacturing Alabama, LLC ("HMMA") and Hyundai Motor America, Inc. ("HMA") submit the following witness list.

A. Witnesses Whom Defendants Expect to Present

1. Wendy Warner, HMMA.

Ms. Warner is a management employee and may be contacted through Defendants' counsel.

2. Robert A. Clevenger, HMMA.

Mr. Clevenger is a management employee and may be contacted through Defendants' counsel.

3. James A. Brookshire, HMMA.

Mr. Brookshire is a management employee and may be contacted through Defendants' counsel.

4. John Applegate, HMMA.

Mr. Applegate is a management employee and may be contacted through Defendants' counsel.

5. William A. Ware, HMMA.

Mr. Ware is a management employee and may be contacted through Defendant's counsel.

6. Greg Prater, formerly HMMA.

Mr. Prater was a management employee and may be contacted through Defendants' counsel.

7. Kevin Hughes, HMMA.

700 Thousand Oak Drive
Montgomery, AL 36109
(334) 451-1752

B. Witnesses Whom Defendants May Call If The Need Arises

8. Kathy Parker, HMA.

Ms. Parker is a management employee and may be contacted through Defendants' counsel.

9. Ron Haughey, HMA.

Mr. Haughey is a management employee and may be contacted through Defendants' counsel.

10. Mickey Phillips, HMMA.

Mr. Phillips is a management employee and may be contacted through Defendants' counsel.

11. John Kalson, HMMA.

Mr. Kalson is a management employee and may be contacted through Defendants' counsel.

12. Scott Gordy, HMMA.

Mr. Gordy is a management employee and may be contacted through Defendants' counsel.

13. Gwang Mun, HMMA.

Mr. Mun is a management employee and may be contacted through Defendants' counsel. Defendants further reserve the right to have a Korean language interpreter present should Mr. Mun be called to testify at trial.

14. Kisha W. Morris, formerly HMMA.

Ms. Morris was a management employee and may be contacted through Defendants' counsel.

15. Greg Kimble, HMMA.

Mr. Kimble is a management employee and may be contacted through Defendants' counsel.

16. J. Timothy Downard, Rule 702 witness.

Haynes Downard, LLP
2121 Second Avenue, North
Suite 100
Birmingham, AL 35203

17. Barry Jackson, HMMA.

Mr. Jackson is a management employee and may be contacted through Defendants' counsel.

18. John McClenney, American Citadel Guard

The American Citadel Guard, Inc.
11858 S. Harrells Ferry Road
Baton Rouge, LA 70816
Local Phone Contact: (334) 387-8910

19. Spenceur Louis, formerly HMMA.

Mr. Louis was a management employee and may be contacted through Defendants' counsel.

20. Sheron Rose, HMMA.

Ms. Rose is a management employee and may be contacted through Defendant's counsel.

21. Craig Stapley, HMMA.

Mr. Stapley is a management employee and may be contacted through Defendant's counsel.

22. Brian Roby, HMMA.

Mr. Roby is a management employee and may be contacted through Defendant's counsel.

23. Andy Dishman, HMMA.

Mr. Dishman is a management employee and may be contacted through Defendant's counsel.

24. Steven Wilburn, HMMA.

Mr. Wilburn is a management employee and may be contacted through Defendants' counsel.

25. Paul Dunbar, HMMA.

3637 Lansdowne Drive
Montgomery, AL 36111
(334) 281-2074

26. Tim Haseltine, HMMA.

Mr. Haseltine is a management employee and may be contacted through Defendant's counsel.

27. Defendants reserve the right to call any custodian of records as may be required to authenticate documents.

28. Defendants reserve the right to call any paralegal as may be required to testify regarding summaries of source documents.
29. Defendants reserve the right to present at trial any witness identified by Plaintiff.
30. Defendants reserve the right to present at trial any witness necessary for rebuttal.
31. Defendants reserve the right to present at trial any witness necessary for impeachment.

C. Deposition Designations

32. Defendants do not anticipate using any deposition testimony unless for rebuttal or impeachment. All witnesses identified are, at this time, expected to be present for live testimony at trial.

Defendants reserve the right to amend their Witness List as justice so requires.

Respectfully submitted this the 5th day of March, 2008.

/s/ J. Trent Scofield

Timothy A. Palmer (PAL-009)

J. Trent Scofield (SCO-024)

T. Scott Kelly (KEL-053)

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Pro Hac Granted 5/15/07

Attorneys for Defendants Hyundai Motor
Manufacturing Alabama, LLC and
Hyundai Motor America, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on the 5th day of March, 2008, I electronically filed the foregoing *Defendants' Witness List* on behalf of Defendants Hyundai Motor Manufacturing Alabama, LLC and Hyundai Motor America, Inc. with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following: W. Perry Hall, Vincent F. Kilborn, III, David Allen McDonald, Jeffrey R. Sport, T. Scott Kelly, Matthew K. Johnson and Timothy A. Palmer.

/s/ J. Trent Scofield
Of Counsel